



COMPLAINTS HANDLING POLICY

Born2Trade Ltd (St Lucia)

www.born2trade.com



Born2trade™

www.born2trade.com

support@born2trade.com

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1. Introduction

This Policy sets out the framework for the effective, fair, and timely handling of complaints and disputes submitted to Born2Trade Ltd (the “Company”). It reflects our commitment to treating clients fairly, acting transparently, and maintaining trust.

Clients have the right to submit a complaint whenever they are dissatisfied with the Company’s services or procedures. This Policy explains how complaints may be lodged, the process for investigation, the timeframes for acknowledgment and response, and the escalation routes available if a matter cannot be resolved internally.

2. Definitions

Complaint: A clear and specific expression of dissatisfaction concerning the Company’s services, actions, or omissions, coupled with a request for corrective action. General requests for information, clarifications, or opinions do not qualify as complaints.

Complainant: An individual or legal entity who submits a complaint, either on their own behalf or via an authorized representative with written authority.

Dispute: An unresolved complaint where the complainant remains dissatisfied with the Company’s final response.

Dispute Resolution: The process of concluding disputes through negotiation, mediation, or adjudication by an independent external body.

3. Submitting a Complaint

Clients are encouraged to raise any issues or concerns with our Customer Support team in the first instance. Queries can be submitted through:

- Email: support@born2trade.com

Our Customer Support staff are trained to resolve issues promptly and efficiently. In many cases, matters can be clarified or settled at this stage without the need for a formal complaint.

If the matter cannot be resolved immediately or if the client is not satisfied with the proposed solution, the issue may be escalated to the Compliance Department. At this stage, the client should submit a formal written complaint using the Complaint Form (Annex 1) or by providing the same information in writing. The completed form should be sent together with any supporting documents through any of the following channels:

- Compliance Department email: compliance@born2trade.com;
- the “Add a Ticket” form in the Client Area (category: Complaint); or
- post to the Compliance Department at Ground Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia.

The Complaint Form requires the client to provide all relevant details, including account information, a clear description of the issue, supporting evidence, and the resolution sought. This structured process ensures that complaints are logged, tracked, and handled in a consistent and transparent manner.

Once received, the Compliance Department will acknowledge receipt of the complaint, register it in the Complaints Register, and begin an independent investigation in accordance with this Policy.

Complaints may be submitted in English or in any language supported by our Customer Support team. Clients may appoint a representative to submit a complaint on their behalf with written authority.

4. Registration of Complaints

All complaints are formally logged in the Complaints Register, which tracks their status from receipt to resolution. Each record includes the date, nature of the complaint, investigation steps, and final outcome.

Data is collected only for the purpose of resolving the complaint and is processed in line with applicable data protection laws and the Company's Privacy Policy.

5. Handling of Complaints

The Company ensures that all complaints are managed fairly, objectively, and without discrimination.

Where a matter can be resolved promptly by Customer Support, this will be done immediately. If not, the complaint is escalated to the Compliance Department for a thorough review. The Company may request additional documentation or clarification from the client to ensure a full and accurate investigation.

All findings are assessed in line with contractual obligations, applicable regulations, and evidence provided.

Complaints are investigated by staff who were not directly involved in the matter complained about.

6. Response to Complaints

- **Acknowledgment:** An acknowledgment of receipt will be issued within five (5) business days of receiving a formal complaint.
- **Investigation and Response:** A final written response will be provided within thirty (30) business days, explaining the Company's decision and the reasons behind it.
- **Extensions:** For complex matters requiring additional time, the client will be notified of the delay in writing, with the reasons and an expected response date, and kept informed of progress.

These timelines are also set out in clause 6.11 of the Client Agreement.

If a complaint is not upheld, the Company will explain the decision clearly and provide information about further escalation options.

7. Dispute Resolution

Where a client remains dissatisfied after receiving the Company's final response, the matter will be deemed a dispute. The Company encourages continued dialogue with the Compliance Department in an effort to reach a negotiated resolution, and the client may ask for the final response to be reviewed by a member of senior management.

If no agreement is reached, the client may pursue the matter before the courts of Saint Lucia in accordance with Section 7 of the Client Agreement. As the Company is not regulated, no financial ombudsman or regulatory complaints scheme is available.

8. Individual Dispute Handling

All complaints and disputes will be addressed on an individual basis only. Clients expressly waive the right to participate in any class, collective, representative, or mass actions in relation to disputes with the Company, consistent with the Client Agreement.

9. Monitoring and Reporting

All complaint records are retained for seven (7) years. The Company regularly analyzes complaint data to identify patterns, improve internal processes, and enhance client service standards.

10. Confidentiality

Complaints are treated with strict confidentiality. Information is shared only with personnel directly involved in the resolution process or with external bodies where disclosure is legally required or necessary for dispute resolution.

Annex 1 – Complaint Form

Client Information

- Full Name:
- Account Number (trading login):
- Address:
- Telephone Number:
- Email Address:
- Preferred contact method and language:

Details of Complaint

Please describe the product, service, or issue you are complaining about. Include dates, transaction IDs / ticket numbers, amounts involved, and the resolution you are seeking. Attach supporting evidence (statements, correspondence, screenshots, etc.) where relevant.

Supporting Documentation

Please enclose copies of all documents that may help us investigate your complaint (e.g., account statements, trade confirmations, or prior correspondence).

Declaration

I hereby confirm that the information provided above is accurate and complete to the best of my knowledge. By submitting this form (including by email or through the Personal area), I confirm this declaration; no signature is required.